

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**SUPPRESSED  
FILED**

JUL 25 2019

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUSTIN BROWN,

Defendant.

No.

**4:19CR578 JAR/NCC**

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about May 19, 2019, in the City of St. Louis, within the Eastern District of Missouri,

**JUSTIN BROWN,**

the Defendant herein, did knowingly and intentionally possess with intent to distribute a quantity of heroin, a Schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT TWO**

The Grand Jury charges that:

On or about May 19, 2019, in the City of St. Louis, within the Eastern District of Missouri,

**JUSTIN BROWN,**

the Defendant herein, did knowingly and intentionally possess with intent to distribute a quantity of cocaine base (crack), a Schedule II controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1).

**COUNT THREE**

The Grand Jury further charges that:

On or about May 19, 2019, in the City of St. Louis, within the Eastern District of Missouri,

**JUSTIN BROWN,**

the Defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a court of the United States, that is, possession of heroin, a Schedule I controlled substance, with intent to distribute; possession of cocaine base (crack), a Schedule II controlled substance, with intent to distribute; as set forth in Counts One and Two of the Indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

\_\_\_\_\_  
GREGORY M. GOODWIN, #65929MO  
Special Assistant United States Attorney